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August 26, 2015

Ms. Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

Re: Mountain Valley Pipeline, LLC  
Docket No. PF15-3-000  
Alternative 200 Update

Dear Ms. Bose:

On October 27, 2014, Mountain Valley Pipeline, LLC (MVP) submitted a request to the Federal Energy Regulatory Commission (Commission) to initiate the Pre-Filing Process for the Mountain Valley Pipeline Project (MVP Project). The MVP Project was accepted into the Pre-Filing Process on October 31, 2014. On December 1, 2014, MVP filed a Summary of Alternatives describing its route selection process and major alternatives being evaluated. MVP submitted an updated analysis of the alternatives in February 2015 and then followed with additional information in an updated draft Alternatives Resource Report in April 2015.

Since that time, MVP has reviewed comments submitted to the Commission and received at open houses and scoping meetings and continued to evaluate the route on the ground from public access points and private parcels where survey permission has been granted by landowners. As a result, a number of resources of concern have been identified near Newport, Giles County, Virginia. MVP has identified an alternative pipeline route (Alternative 200) to reduce impacts on these resources in this area.

Attached hereto is a summary of Alternative 200 as well as a figure that shows the general location of Alternative 200 in comparison to the Proposed Route and previously-filed Alternatives 87 and 93. MVP continues to evaluate Alternative 200 and will file with the Commission in the future a final Resource Report 10 that will include further descriptions of this alternative and a detailed comparison of the Proposed Route to the Alternative 200 route.

Pursuant to Section 157.21(f)(4) of the Commission's regulations, MVP will be submitting the stakeholder mailing list for Alternative 200 directly to Commission staff as well as to the third party environmental contractor.

Kimberly D. Bose

August 26, 2015

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Should you have any questions regarding this matter, please contact the undersigned by telephone at (412) 553-5786 or by e-mail at meggerding@eqt.com.

Respectfully submitted,

Mountain Valley Pipeline, LLC



Matthew Eggerding  
Counsel, Midstream

Attachments

cc: Paul Friedman (w/enclosures)  
Lavinia M. DiSanto, Cardno, Inc. (w/enclosures)  
Doug Mooneyhan, Cardno, Inc. (w/enclosures)



Mountain Valley Pipeline Project

Docket No. PF15-3

**Alternative 200 Update**

## ALTERNATIVE 200 UPDATE

### 1.1 INTRODUCTION

On October 27, 2014, Mountain Valley Pipeline, LLC (MVP) submitted a request to initiate the Pre-Filing Process for the Mountain Valley Pipeline Project (MVP Project). The MVP Project was accepted into the FERC Pre-Filing Process on October 31, 2014. On December 1, 2014, MVP filed a Summary of Alternatives describing its route selection process and major alternatives being evaluated. An updated analysis of the alternatives was submitted in February 2015 and then followed with additional information in an updated draft Alternatives Resource Report (draft RR 10) filed in April 2015.

Since that time, MVP has reviewed comments submitted to FERC and received at open houses and scoping meetings and continued to evaluate the route on the ground from public access points and private parcels where survey permission has been granted by landowners. As a result, a number of resources of concern have been identified near Newport, Giles County, Virginia. MVP has identified an alternative pipeline route to reduce impacts on these resources in this area. The following is a summary of the Alternative 200 route. MVP continues to evaluate this alternative and will file with FERC in the future a final Resource Report 10 – Alternatives that will include further descriptions of this alternative and a detailed comparison of the Proposed Route to the Alternative 200 route.

#### 1.1.1 Alternative 200

In October 2014, MVP proposed a pipeline route through Giles and Montgomery Counties Virginia that is adjacent to an existing overhead electric transmission line right-of-way (AEP Transmission Line). Upon further investigation of that route, MVP identified the Alternative 200 route as a possible variation to avoid pipeline constructability issues relating to co-location with the AEP Transmission Line in the Preston Forest area due to power line right-of-way encroachment, several areas of karst topography with known sinkholes and caves, construction near a number of residences, and construction near private water wells. Because of the topography and encroachment in the area, co-location with the AEP Transmission Line in the area of the proposed route would make it difficult for AEP to maintain operational access and could be potentially unsafe during construction. The Proposed Route would need to be designed to avoid residences that have encroached onto the AEP right-of-way, which would result in several crossings of the AEP Transmission Line. MVP discussed this issue with AEP on June 8, 2015 and from an operational standpoint, AEP was not amenable to the Proposed Route crisscrossing their right-of-way in this area due to encroachment on their line and lack of available space. In addition, there are inherent risks to construction work crews associated with pipeline construction under high voltage power lines. For reasons of worker safety, MVP prefers to minimize the number of crossing of these lines. This area of the Proposed Route will likely require blasting. The Alternative 200 route would eliminate potential impacts from blasting near residences, associated water wells, and the AEP Transmission Line towers.

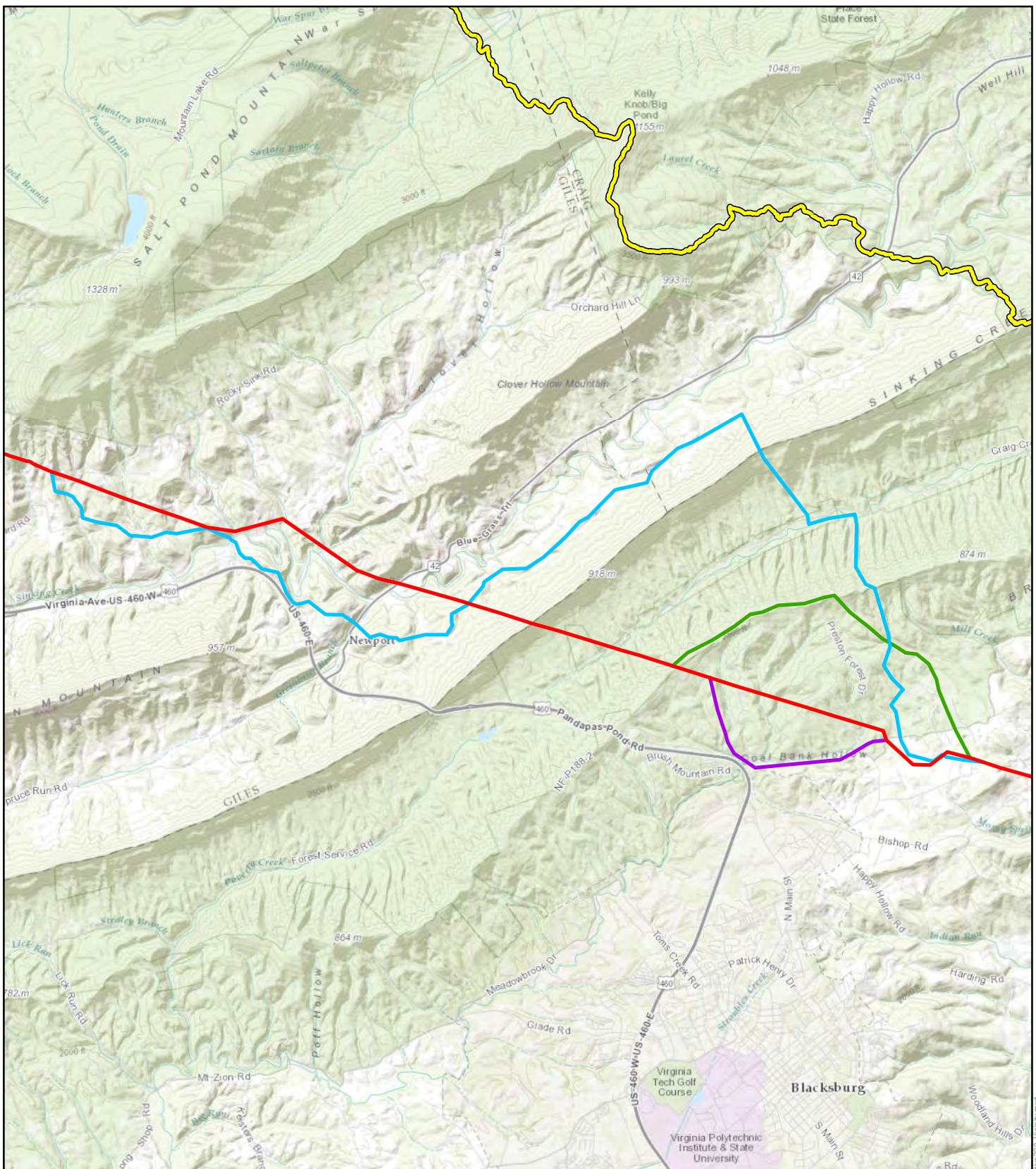
The Alternative 200 route is 14.7 miles long and located approximately between the Proposed Route mileposts of 207.0 and 217.5 (see attached figure). Alternative 200 is in the same general area and would avoid some of the same resource issues as Alternative 93 and Alternative 87 that have been previously identified by MVP and evaluated in draft RR 10. Alternative 200 is also encompassed by the longer Alternatives 110, 110J, and 110R that have also been previously identified and evaluated by MVP in draft RR 10. Alternative 200 would be within about one mile of the Proposed Route for approximately one-half its length, and the furthest it would deviate from the Proposed Route is about 2.5 miles.

The alternative is 4.2 miles longer than the corresponding segment of the Proposed Route and will increase disturbance through the Jefferson National Forest by about 0.6 mile (about 1.8 miles crossed compared to 1.2 miles crossed by the corresponding segment of Proposed Route). Alternative 200 would turn south at approximate milepost 207.0 and continue on the south side of the Proposed Route until approximate milepost 211.5. The shift to the south would avoid known karst features and caves near mileposts 207.5 (Pig Hole Cave), 209.0, and 209.5 (Smokehole Cave and Tawneys Cave). This shift would also avoid a Virginia Outdoors Foundation property at approximate milepost 209.5, reduce potential visual impacts on the covered bridge near approximate milepost 210.2 associated with the Greater Newport Rural Historic District, and avoid impacts on the ballfield and other community resources at the Newport Community Park at approximate milepost 211.0. The Alternative 200 route would then head northeast and cross the Proposed Route at approximate milepost 211.7 and continue in that general direction into Craig County for a short distance before turning south-southeast and crossing into the Jefferson National Forest. The route would continue south-southeast and pass the Preston Forest area on the east side before crossing the Proposed Route at approximate milepost 217.0, and then continue adjacent to and just south of the Proposed Route for another 0.5 mile before rejoining the Proposed Route at milepost 217.5.

The northerly extent of the Alternative 200 route is necessary in order to cross the adjacent mountain in a perpendicular construction method versus extensive side slope construction. The mountainous terrain dictated the routing in a more triangular fashion rather than a smooth circular routing around the area. Alternative 93 is a similar alternative to Alternative 200; however, Alternative 200 avoids several karst and cave topography areas and reduces the side slip alignment and erosion and sediment control issues associated with Alternative 93. The furthest deviation from Alternative 200 to the Alternative 93 is 2 miles.

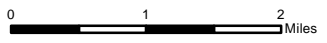

MVP will continue to evaluate this alternative as survey permission is granted by the Jefferson National Forest and landowners. A detailed analysis and comparison of this alternative with the Proposed Route will be provided in MVP's application with the FERC.





**Mountain Valley Pipeline Project**

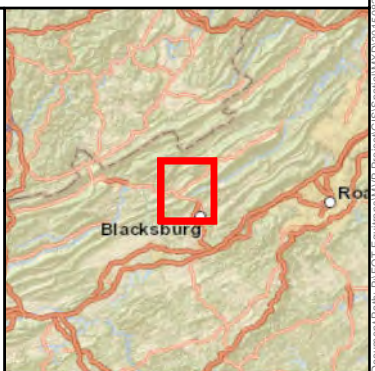
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**Alternative 200, 93 & 87**

August 2015

- Legend**
- Proposed Route
  - Alternative 200
  - Alternative 87
  - Alternative 93
  - Appalachian Trail



Data Sources: ESRI Streaming Data, 2015,